

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

Hearing Date: Dec. 16, 2019
Time: 9:30 a.m.

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In re

HELEN PARDO DE FIGUEROA
a/k/a Flora E. Claros
a/k/a Flora Calderon,

Case No. 19-44421-ess

Debtor.

Chapter 13

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RESPONSE TO MOTION TO DISMISS

Helen Pardo de Figueroa, by and through her attorneys Ortiz & Ortiz LLP, here by states as follows in response to the Ch. 13 Trustee's Motion to Dismiss:

1. The Debtor requests that the Court adjourn the Ch. 13 Trustee's motion to dismiss her case. The Court entered an order granting relief from the automatic stay to permit the Debtor and her primary creditor, her ex-husband, to attempt to address their issues in the state court. The effective date of the order is February 1st.

2. The Debtor has retained separate counsel to address the state court matter. I respectfully request and adjournment of the motion so that the Debtor can complete her attempt to resolve her dispute and ascertain whether a reorganization before the Court is viable.

WHEREFORE, the Debtor requests that the Court adjourn the motion or grant such other and further relief as deemed just.

Dated: Astoria, New York
Dec. 13, 2019

S/Norma E. Ortiz
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Helen Pardo de Figueroa, Chapter 13
Service List

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